

EXHIBIT A

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16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**
19

20 IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
21 LITIGATION

Case No. 3:23-md-03084-CRB

DECLARATION OF BRIAN JOHNSON

22 This Document Relates to:
23 ALL ACTIONS
24

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

1 I, Brian Johnson, having personal knowledge of the following state:

2 1. I have attained the age of eighteen years old.

3 2. I am an employee of Uber Technologies, Inc., (“Uber”), and I am a Regional Operations
4 Manager on the Safety Operations team. I have worked on the Safety Operations team for five years.

5 3. My job responsibilities include managing relationships with various technology
6 vendors, including 7x7 Experience. In performing these tasks, I have gained personal knowledge of
7 the information in this declaration.

8 4. Uber operates in a highly competitive industry. Protecting its proprietary information,
9 including trade secrets, algorithms, and business strategies, is essential to maintaining Uber’s
10 competitive edge. Unauthorized disclosure or access to this information could compromise Uber’s
11 market position and hinder its ability to innovate and deliver superior services.

12 5. As a global entity, Uber is subject to various legal and regulatory requirements
13 regarding data protection and privacy. Compliance with these regulations is not only a legal obligation
14 but also a testament to Uber’s commitment to ethical business practices. Ensuring the confidentiality
15 and integrity of sensitive information helps Uber meet these obligations and avoid potential legal and
16 financial repercussions.

17 6. 7x7 Experience provides webinar courses on safety and professionalism for rideshare
18 drivers. The courses do not provide any sexual assault or sexual harassment training. Uber has worked
19 with 7x7 Experience since 2014.

20 7. To enable these webinar courses, Uber and 7x7 have each provided significant
21 proprietary information on their respective platforms to each other, including technical data on
22 workflow processes that are highly proprietary, in addition to driver eligibility data.

23 8. Uber’s agreement with 7x7 Experience recognizes that the parties have proprietary
24 rights in data obtained under it.
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Brian Johnson
Brian Johnson